

Montgomery City Plant Proposed Closure of Action Items

	Question		Assigned		Due	Section	Note	Issue	Recommendation	Proposed Closure of Item	Status
6	For facilities that choose not to respond to accidental releases, is the facility included in the community emergency response plan as required by 40 CFR Part 68.90, are appropriate mechanisms in place to notify emergency responders in the event of a release, for facilities with flammables, is emergency response coordinated with the local fire department? (documentation on file from public safety officials indicating coordination has been done)	No	Duane Miller	2	08-Jan-15	L- Emergency Planning and Response		There is no indication that facility personnel have coordinated with the city or county on accidental release issues.	Review the facility's emergency response plan with appropriate city and county emergency personnel. Develop a memorandum of understanding or other statement of community assurance.	Tyson will invite the local emergency responders (city police, sheriff's office, ambulance services, and fire department) for a tour and meeting to ensure there is a plan to address any emergency at the facility.	Open
9	Regarding NH3 processes, is Safety Relief Valve testing being performed by a Tyson VMR vendor on a representative sample of SRVs upon replacement?	NO	Duane Miller	2	08-Jan-15	H- Mechanical Integrity		The facility has not sent SRVs to a Tyson VMR vendor upon replacement.	Develop a program to forward sample RVs to FCX during the next replacement interval.	A Tyson Corporate program exist and will be used at this facility. Samples of the SRVs will be sent for testing during the next SRV replacement.	Open
4	Is there documentation that indicates employees involved in operating the process have received refresher training on the Operating Procedures following the OJT/OJE training program at least every 3 years? (PSMF 607 is good for initial training and first refresher, PSMF 608 used thereafter)	No	Duane Miller	2	08-Jan-15	E- Training		There was no record that the refrigeration lead had been provided with refresher training.	Provide a review for the refrigeration lead to ensure that he is familiar with the ammonia refrigeration system and meets the standards set forth by Tyson for refrigeration training.	Duane Miller will conduct the training and ensure all SOP, OJT, and other training as outlined in the facility's PSM Program is completed and documented correctly.	Open
8	Have SOPs been reviewed and certified annually to assure they reflect current operating practices ? (SOP Initial Approval covers first year certification)	No	Duane Miller	2	08-Jan-15	D- Operating Procedures	The following SOPs were not certified for 2013/4: SOPHTRECIRC; SOP-HP/THREC-1; SOP GHE & CB-17; and SOPOil Drain.	Several SOPs had not been certified as reviewed annually.	Review and certify those SOPs which have not been certified in the last annual cycle. Ensure all SOPs are reviewed and certified annually.	The last few SOPs will be revised and recertified. The recertification will be conducted annually.	Open
5	Are the Technical Operating Specifications in the Operating Procedures consistent with the Process Safety Information ?	No	Duane Miller	2	08-Jan-15	D- Operating Procedures	SOPs CB-1 through CB-6 describe an FCV (250374, 250334, 250262, 250250, 250220, 250152) which should be a PCV.	Several SOPs for the control banks did not accurately describe the valve type.	Revise the operating procedures to accurately reflect the valve type installed.	Most of the SOPs have been revised. The last few will be completed.	Open
14	Does the Process Safety Information (PSI) include Safety systems for equipment in the process ? (interlocks, detection or suppression systems, PSMF 311)	No	Duane Miller	2	08-Jan-15	B- Process Safety Information		The facility has not detailed its safety systems in any consolidated location.	Develop a summary of safety systems, such as Tyson form PSMF 311.	A Tyson PSMF 311 will be completed for the facility.	Open